



Hoffman Employment Law, LLC

600 Jefferson Plaza Suite 204

Rockville, MD 20852

Phone: 301-251-3752 | Fax: 301-251-3753

Account Statement

Prepared for Justin Edward VanPelt

Re: Unpaid Wage Claim Giuseppe's Italian Restaurant

Previous Balance	\$0.00
Current Charges	\$12,382.50
New Balance	\$12,382.50
Adjustments	\$0.00
Payments	\$0.00
Now Due	\$12,382.50
Trust Account	\$0.00

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PRE-BILL

Justin Edward VanPelt

Invoice Date: July 08, 2019
 Invoice Number: Pre-bill
 Invoice Amount: \$12,382.50

Matter: Unpaid Wage Claim Giuseppe's Italian Restaurant

Attorney's Fees

2/11/2019	Interview potential client regarding payment of final check and overtime wages while employed at Giuseppe's (.4); Draft letter of representation for potential clients (.4); Draft email to potential client regarding letter of rep and second interview (.1).	G.H.	.90	\$184.50
2/15/2019	Draft comm to G. Herbers re status of matter.	H.B.H.	.10	\$40.00
2/21/2019	Call with potential client regarding overtime claim claims against Giuseppe's (.4); Draft email to client regarding letter of representation (.1)	G.H.	.50	\$102.50
2/21/2019	Call with second potential client regarding overtime claims against Giuseppe's (.4); Draft second email to potential client regarding letter of representation (.1).	G.H.	.50	\$102.50
2/22/2019	Call with client R. Keller regarding overtime claims and wage/hour documents (.2); Review documents provided by client R. Keller (1.4).	G.H.	1.60	\$328.00
2/22/2019	Review schedules and paystubs of R. Keller.	H.B.H.	.30	\$120.00
2/25/2019	Review case file, draft complaint.	G.H.	3.70	\$758.50
2/26/2019	Review case file, draft complaint.	G.H.	1.10	\$225.50
2/27/2019	Review case file, draft complaint.	G.H.	1.10	\$225.50
2/28/2019	Call with client J. Van Pelt regarding case update and experiences at Giuseppe's (.4); Review and revise complaint (1.4).	G.H.	1.80	\$369.00

3/1/2019	Call with client R. Keller regarding employment experience at Giuseppe's.	G.H.	.50	\$102.50
3/4/2019	Review and revise complaint.	G.H.	.80	\$164.00
3/5/2019	Review and revise complaint (.5); Correspond with clients regarding teleconf. to discuss complaint and future steps (.2).	G.H.	.70	\$143.50
3/6/2019	Tele conf with JV and G. Herbers re status of matter. (.2 hrs); tele conf. with RK and G. Herbers re status of matter and potential issues re defenses (.4 hrs); tele conf. with JT and G. Herbers re status of matter. (.2 hrs). Review and revise Complaint. Review proposed summons and civil cover sheet. (.2 hrs). Open case via ECF. (.1 hrs).	H.B.H.	1.10	\$440.00
3/6/2019	Call with client J. Van Pelt regarding case status and future steps (.2); Call with client R. Keller regarding case status and future steps (.4); Call with client J. Taylor regarding case status and future steps (.2); Conf. with HBH regarding complaint revisions and assignments (.1); Revise complaint (.2); Draft civil coversheet and summons (.3).	G.H.	1.40	\$287.00
3/7/2019	File Pl. Consent to Magistrate Judge.	J.L.	.10	\$20.50
3/7/2019	Draft email to client regarding case status and future steps (.2); Draft Plaintiffs' consent to Magistrate Judge (.1).	G.H.	.30	\$61.50
3/7/2019	Communicate with process server re assignment.	H.B.H.	.10	\$40.00
3/7/2019	Review Order re consent to Magistrate; comm. with assoc. atty re preparation of same.	H.B.H.	.10	\$40.00
3/7/2019	Review summons issued and notice of case assignment.	H.B.H.	.10	\$40.00
3/11/2019	Confer with G. Herbers re potential new additional plaintiff and strategies re amendment. Discuss service of process.	H.B.H.	.20	\$80.00
3/11/2019	Draft memo to service processor regarding service of lawsuit on defendants (.3); Prepare documents for service on defendants, prepare postage and mailing to process server (.3).	G.H.	.60	\$123.00
3/11/2019	Call with potential client regarding employment experience at Giuseppe's, overtime lawsuit, and procedure to join case (.4); Draft email to potential client regarding letter of representation (.1).	G.H.	.50	\$102.50
3/11/2019	Draft comm to K. Taylor re status of matter.	H.B.H.	.10	\$40.00
3/18/2019	Research proper address for service of lawsuit on Defendants.	G.H.	.20	\$41.00
4/1/2019	Review filing of entry of appearance by opposing counsel.	H.B.H.	.10	\$40.00
4/2/2019	Review Order of Court and filing re Consent to Magistrate.	H.B.H.	.10	\$40.00

4/3/2019	Review case file, prepare proofs of service for Giuseppe's Inc. and M. Witt for filing.	G.H.	.10	\$20.50
4/3/2019	Draft comm to opposing counsel re service issue. Review response.	H.B.H.	.20	\$80.00
4/3/2019	Review filing of proof of service.	H.B.H.	.10	\$40.00
4/8/2019	Review email from opposing counsel re. acceptance of service.	J.L.	.10	\$20.50
4/8/2019	Review response from opposing counsel re service of complaint.	H.B.H.	.10	\$40.00
4/9/2019	Review email from opposing counsel re. acceptance of service for Def. Witt.	J.L.	.10	\$20.50
4/9/2019	Review and respond to opposing counsel's email re service. (.1 hrs). Review Answer and compare to Complaint allegations. (.3 hrs).	H.B.H.	.40	No Charge
4/10/2019	Review order for conference call re. scheduling order and informal discovery dispute memo from Court.	J.L.	.20	\$41.00
4/11/2019	Review Defendants' Answer, the Court's proposed schedule, proposed scheduling order, and discovery dispute procedures.	G.H.	.40	\$82.00
4/18/2019	Review answer with HBH and SEK and discuss motion to strike.	J.L.	.20	\$41.00
4/18/2019	Review Answer, Discuss Motion to Strike	S.K.	.20	\$41.00
4/18/2019	Confer with SK and JL re moving to strike deficient answer.	H.B.H.	.20	\$80.00
4/22/2019	Drafting Motion to Deem Admitted	S.K.	1.80	\$369.00
4/23/2019	Mtg. with Jordan and Howard re: Joint-Stipulation	S.K.	.20	\$41.00
4/23/2019	Call w/ opposing counsel re: schedule and joint-stip	S.K.	.10	\$20.50
4/23/2019	Confer w/ HBH and SEK re. case schedule and joint stipulation and case strategy.	J.L.	.20	\$41.00
4/23/2019	Phone confer w/ HBH, SEK, and opposing counsel re. case schedule in prep for phone call w/ judge.	J.L.	.10	\$20.50
4/23/2019	Draft joint stipulation of enterprise coverage.	J.L.	.30	\$61.50
4/23/2019	Tele conf with opposing counsel and associates re scheduling and status of matter.	H.B.H.	.10	\$40.00
4/24/2019	Phone confer w/ Judge and opposing counsel re. prop. schedule.	J.L.	.20	\$41.00
4/24/2019	Conference w/ HBH and SEK on case status and assignment of duties.	J.L.	.10	\$20.50
4/24/2019	Review Case Status	S.K.	.10	\$20.50
4/24/2019	Review Scheduling Order entered.	H.B.H.	.10	\$40.00
4/30/2019	Review joint stipulation re. enterprise coverage w/ HBH, draft and send email to opposing counsel re. same.	J.L.	.10	\$20.50
5/6/2019	Prepare interrogatories for mailing, draft email to opposing counsel re. interrogatories.	J.L.	.20	\$41.00
5/6/2019	Draft interrogatories and request for production of documents; review and revise same.	H.B.H.	2.40	\$960.00
5/10/2019	File Joint Stipulation re Enterprise Coverage.	H.B.H.	.10	No Charge
5/17/2019	Review communications re: Amended Complaint	S.K.	.10	\$20.50
5/17/2019	Review and respond to comm from client (JV) re	H.B.H.	.20	\$80.00

	status of matter. (.1 hrs). Review and respond to comm from opposing counsel. (.1 hrs).			
5/21/2019	Review scheduling order, update calendar.	J.L.	.20	\$41.00
5/21/2019	Review pleadings file and complaint.	J.L.	.20	\$41.00
5/22/2019	Phone call w/ Pl. K. Taylor re: employment details.	J.L.	.30	\$61.50
5/22/2019	Draft amended complaint.	J.L.	1.30	\$266.50
5/23/2019	Draft and edit amended complaint.	J.L.	1.50	\$307.50
5/28/2019	Edit amended complaint.	J.L.	.10	\$20.50
5/28/2019	Draft motion for leave to file 1st amended complaint and proposed order.	J.L.	.40	\$82.00
5/28/2019	Prepare and file motion for leave to file first amended complaint, accompany attachments and proposed order.	J.L.	.30	\$61.50
5/28/2019	Review Amended Complaint	S.K.	.30	\$61.50
5/28/2019	Confer with J. Liew re preparing Motion for Leave to File First Amended Complaint. (.2 hrs). Review and revise First Amended Complaint; prepare redline and forward to opposing counsel. (.5 hrs).	H.B.H.	.70	\$280.00
5/29/2019	Entering Notice of Appearance	S.K.	.20	\$41.00
5/29/2019	Review Order re granting leave re First Amended Complaint.	H.B.H.	.10	\$40.00
5/29/2019	Review Order re First Amended Complaint; review Court filing of First Amended Complaint.	H.B.H.	.10	\$40.00
5/30/2019	Draft comm to expert witness re status of matter.	H.B.H.	.10	\$40.00
6/3/2019	Review emails between HBH and opposing counsel re: discovery production.	J.L.	.10	\$20.50
6/3/2019	Drafting Lodestar Statement	S.K.	.40	\$82.00
6/3/2019	Drafting RPDs	S.K.	2.20	\$451.00
6/3/2019	Review comms. with counsel re: discovery production	S.K.	.20	\$41.00
6/3/2019	Comm with opposing counsel re discovery.	H.B.H.	.10	\$40.00
6/3/2019	Review billing records. Draft comm to assoc atty re lodestar. Review lodestar; comm. with assoc atty re same.	H.B.H.	.20	\$80.00
6/6/2019	Review Settlement Offer	S.K.	.30	\$61.50
6/6/2019	Confer w/ HBH re: settlement offer	S.K.	.10	\$20.50
6/7/2019	Review email from SEK to Pls. re: damage calculations	J.L.	.10	\$20.50
6/7/2019	Review email from opposing counsel re: wage documents.	J.L.	.10	\$20.50
6/7/2019	Confer with S. Kraff re wage/hour records and offers of judgment. Review comm from S. Kraff to clients; comm re same.	H.B.H.	.30	\$120.00
6/7/2019	Review production of documents by Defendants	S.K.	1.70	\$348.50
6/7/2019	Drafting email to clients re: offer of judgment	S.K.	.30	\$61.50
6/10/2019	Call w/ Van Pelt re: Offer of Judgment	S.K.	.20	\$41.00
6/10/2019	Call w/ Keller re: Offer of Judgment	S.K.	.20	\$41.00
6/10/2019	Review email communications between HBH and opposing counsel re: discovery deadlines and settlement possibility.	J.L.	.10	\$20.50
6/14/2019	Review email from opposing counsel re: settlement	J.L.	.10	\$20.50

	offer.				
6/14/2019	Review comm from opposing counsel re settlement issues.	H.B.H.	.10	\$40.00	
6/18/2019	Review email from opposing counsel re. acceptance of attorneys' fees and moving forward on settlement.	J.L.	.10	\$20.50	
6/19/2019	Drafting Settlement Agreement	S.K.	2.10	\$430.50	
6/19/2019	Drafting Motion to Approve Settlement	S.K.	2.80	\$574.00	
6/21/2019	Review and revise settlement agreement. Review and revise Motion for Settlement. Review proposed Order. Draft comm to opposing counsel attaching same.	H.B.H.	.60	\$240.00	
6/26/2019	Review email from SEK to opposing counsel re. set agreement.	J.L.	.10	\$20.50	
6/26/2019	Draft email to counsel re: settlement agreement	S.K.	.10	\$20.50	
6/27/2019	Review comm from opposing counsel; review proposed edits to agreement. Confer with Associate Atty (SK) re same.	H.B.H.	.20	\$80.00	
6/27/2019	Review edits to Settlement Agreement	S.K.	.80	\$164.00	
6/28/2019	Review edits to settlement agreement; multi comm with opposing counsel re status of matter.	H.B.H.	.30	\$120.00	
7/1/2019	Review Comms re: Settlement Agreement	S.K.	.20	\$41.00	
7/1/2019	Review comm from opposing counsel attaching signed agreement.	H.B.H.	.10	\$40.00	
7/2/2019	Assisting w/ DocuSign signing of set. agreement.	J.L.	.10	\$20.50	
7/2/2019	Draft extensive comm to clients re status of matter, including settlement.	H.B.H.	.40	\$160.00	
7/2/2019	Prepare Docusign of Settlement Agreement	S.K.	.40	\$82.00	
7/3/2019	Confer w/ HBH and SEK re. case status.	J.L.	.10	\$20.50	
7/3/2019	Confer with associate attorneys re status of matter.	H.B.H.	.10	\$40.00	
7/3/2019	Confer w/ HBH and JSL re: case status and priorities	S.K.	.10	\$20.50	
7/5/2019	Phone call w/ Pl. Keller re. DocuSigning settlement agreement.	J.L.	.10	\$20.50	
7/5/2019	Prepare Docusign of Settlement Agreement (new link)	S.K.	.20	\$41.00	
7/7/2019	Assemble settlement agreement; forward same to opposing counsel with comm re Motion for Settlement Approval.	H.B.H.	.30	\$120.00	
7/8/2019	Prepare Declaration of Hours	S.K.	.20	\$41.00	
7/8/2019	Draft declaration for settlement agreement.	J.L.	.10	\$20.50	
SUBTOTAL:			49.40	\$11,857.50	

Costs

3/6/2019	Filing Fee	\$400.00
4/4/2019	Service of Process - Dawn Orem-Dolly	\$125.00
SUBTOTAL:		\$525.00

Matter Ledgers

SUBTOTAL:

Trust Account

7/8/2019	Previous Balance	\$0.00
Available in Trust:		\$0.00

TOTAL \$12,382.50
PREVIOUS BALANCE DUE \$0.00

CURRENT BALANCE DUE AND OWING \$12,382.50